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ExxonMobil
Chemical

Via Electronic Submission

February 5, 2002

Hon. Christine Todd Whitman
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program
ExxonMobil Chemical Company Registration Number [REDACTED]

Dear Ms. Whitman:

ExxonMobil Chemical Company (EMCC) has previously submitted for review and public comment the test plan and related robust summaries for the *Alkyl Alcohols C6-C13* category, under the US High Production Volume (HPV) Chemical Challenge program, AR-201. We hereby submit an addendum to the test plan. The test material in an oral repeated dose study was inadvertently reported as CAS# 68526-86-3, Alcohols C11-14 iso, C13 rich. The test material was in fact the ethoxylated form of the material. The ethoxylated form of the tridecyl alcohol is not expected to be metabolized to the parent compound, so the material is not appropriate for readacross. The addendum reflects this change. However, we are including a reference to a repeated dose study that was conducted on 1-dodecanol (CAS# 112-53-8), an isomer of CAS# 68526-86-3: Alcohols C11-14 iso, C13 rich. This study is included in the European Chemicals Bureau IUCLID file that is publicly available, and was included with our original submission.

As discussed in the revised test plan, since there are publicly available repeated dose studies on isomers of the Alkyl Alcohols, no further repeated dose studies are proposed. This test plan covers the following category of chemicals, Alkyl Alcohols C6-C13:

CAS# 68526-79-4: Hexanol, branched and linear
CAS# 70914-20-4: Alcohols C6-8, branched
CAS# 68526-83-0: Alcohols C7-9 iso, C8 rich
CAS# 68526-84-1: Alcohols C8-10 iso, C9 rich
CAS# 68526-85-2: Alcohols C9-11 iso, C10 rich
CAS# 68526-86-3: Alcohols C11-14 iso, C13 rich

We understand that this information will be posted on the internet for a 120 day comment period. Please forward technical comments on this test plan to Laura H. Keller at the above address or you may contact her at (281) 870-6501 (email: laura.h.keller@exxonmobil.com).

Sincerely,

Nigel J. Sarginson
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ExxonMobil Chemical Company